

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO: 22-20456-CR-MOORE/LOUIS

UNITED STATES OF AMERICA

v.

REINALDO MIRALLES GONZALEZ,
Defendant.

FACTUAL PROFFER

If this matter were to proceed to trial, the Government would prove beyond a reasonable doubt the following facts:

In December 2017, victim J.P., a fifty-eight year old resident of Corona, New York, called the FBI to report that he was the victim of a scam. J.P. reported that he was a day trader and in September 2017, after making a profit of \$10,000 he went to a Western Union office in Flushing, New York, to send a portion of those earnings to his partner in the United Kingdom. After leaving the Western Union store he was contacted by a representative from Western Union who advised him that the wire did not go through because Western Union thought it was a possible scam.

The next day, September 28, 2017, J.P. said that he received a phone call from a man claiming that he was from Interpol London. This individual told J.P. that he, J.P., had tried to send money to terrorists. Shortly after that phone call J.P. received another phone call from a male who identified himself as Special Agent Michael Dalonzo from the FBI office in Miami, Florida. There is in fact a Michael Dalonzo who at the time of this incident was an Assistant Special Agent in Charge at the FBI Miami Field Office.

J.P. reported that this Special Agent Dalonzo told him that he was in trouble for trying to send money to terrorists. Dalonzo told J.P. that if he sent money to the International Court in Miami it would pay for his international court fees, which amounted to \$10,000. Dalonzo told J.P. that it was possible that the police were coming to arrest him shortly and that he needed to send the money as quickly as possible to avoid being arrested. He then provided specific instructions including that 10 blank United States Postal money orders, each in the amount of \$1,000, should be sent to:

S.J.O. Linda Carson
1140 West 50th Street, Suite 400 B
Hialeah, Florida, 33012

Dalonzo ended the call by telling J.P. that a lawyer would be contacting him in the near future.

Records obtained from Sunbiz show that a business, Centro De Rehabilitacion Nueva Vida Corporation was located at 1140 West 50th Street, Suite 400B, Hialeah, Florida. The president and registered agent for this company was defendant, Reinaldo Miralles Gonzalez.

On or about September 29, 2017, J.P., per Dalonzo's instructions sent 10 \$1,000 United States money orders to the address provided. The money orders were sent via Federal Express. J.P. later received a phone call from an Eric Tores who represented himself to be a lawyer in New Jersey, who could assist J.P. with his legal problems for a fee of \$18,000. J.P. became suspicious at that time and did not send any additional funds.

J.P. provided the case agent with copies of the Federal Express receipt and the Western Union receipts for the money orders. With the serial numbers provided on the receipts the agent was able to request from the United States Postal Inspection Service copies of the 10 money orders

purchased by J.P. on September 29, 2017. On the "pay to" portion on all 10 money orders, the name Reinaldo Miralles was written in. Five (5) of the money orders were deposited into Centro De Rehabilitacion Nueva Vida Corporation's J.P. Morgan Chase bank account ending 5656. Three (3) were deposited into Miralles' personal J.P. Morgan's bank account ending 3823. The other two money orders were deposited into Miralles' personal J.P. Morgan's bank account ending 2934.

The agent located six (6) additional victims who all told stories similar to J.P. These victims were L.T. (72 years old) from Daly City, California, K.S. (59 years old) and C.S. (25 years old) from Canal Winchester, Ohio, T.M. (76 years old) from Aurora, Colorado, D.M. (58 years old) from Lebanon, Tennessee, and B.F. (66 years old) from Washington, Montana. All reported that they had befriended individuals on social media platforms such as dating sites. During those friendships/relationships the victims had given money to the persons befriended. At some point in the friendship/relationship the victims were asked to send money through Western Union. Shortly after going to Western Union each victim reported being contacted by someone who represented himself to be from the FBI or other law enforcement agency. In several instances the names of real FBI agents were used by the callers.

The victims were all told that they were being investigated for their involvement and support of terrorist activities. They were all told that they were in serious trouble and in order to avoid imminent arrest they had to send blank United States Postal money orders to addresses which included ones associated with the defendant. Those addresses included defendant's companies (a) Centro De Rehabilitacion Nueva Vida Corporation, located at 1140 West 50th Street, Suite 400B, Hialeah, Florida, (b) Caribbean S.A. Corp. which had a mailbox address of 936 SW

1st Avenue, #912, Miami, Florida, and (c) defendant's personal address located on Brickell Avenue, Miami, Florida. All the victims mailed the money orders using Federal Express.

In some instances victims were also contacted by individuals who represented that they were attorneys who could assist them with their court cases for additional fees. All the victims reported that they felt threatened and intimidated by the calls and paid the funds so that they could resolve the purported investigations as quickly as possible. Some victims reported that they were forced to withdraw the funds demanded from their retirement savings accounts.


In all the victims lost \$123,398. Analysis of bank records show that the money orders sent to addresses associated with defendant were deposited into defendant's personal as well as his companies' bank accounts at Citibank, T.D. Bank. J.P. Morgan Chase Bank, Regions Bank and Bank of America.

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

Date: 10/5/2022

By: 
LOIS FOSTER-STEERS
ASSISTANT UNITED STATES ATTORNEY

Date: 11/30/22

By: 
SABINO JAUREGUI, ESQUIRE
ATTORNEY FOR DEFENDANT

Date: 11/30/22

By: 
REINALDO MIRALLES GONZALEZ
DEFENDANT